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January 23, 2023

VIA ECF

The Honorable Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD)(SN)  
*Ashton, et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN)  
*Bauer, et al. v. al Qaeda Islamic Army, et al.*, 02-cv-7236 (GBD)(SN)  
*Burlingame v. Bin Laden, et al.*, 02-cv-7230 (GBD)(SN)  
*Ashton, et al. v. Kingdom of Saudi Arabia*, 17-cv-02003 (GBD)(SN)  
*Ryan, et al. v. Islamic Republic of Iran, et al.*, 20-cv-00266 (GBD)(SN)

Dear Judge Netburn,

I write this short letter to correct the record with respect to an assertion in the Declarations of John F. Schutty, Esq., filed in support of his motions to substitute counsel. *See* ECF 8835-1 and 8836-1. In those declarations, Mr. Schutty states that I consented to the proposed substitutions. *See id.* at ¶ 3. That is incorrect. As I wrote to Mr. Schutty prior to his filing, though I did not want to impede the substitution motions, given that I was not prior counsel for his clients, I did not believe I had a role in the substitution process and would not, therefore, be signing a consent order. Mr. Schutty's statement in the declaration may have simply been an oversight, and I write only to correct the record on that point.

Respectfully,

Kreindler & Kreindler LLP

By: /s/ James P. Kreindler

JPK:lr